

# MEMO ENDORSED

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January 17, 2014

**BY E-MAIL AND E-FILING**

The Honorable Judge Richard J. Sullivan  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

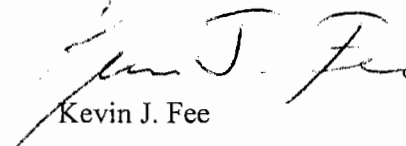
Re: Beth Israel Medical Center et al. v. Verizon Business Network Services, Inc.  
et al. 11 Civ. 4509 (RJS) [rel. 12 Civ. 1028]; Beth Israel Medical Center  
et al. v. Siemens Information and Communication Networks, Inc. et al.,  
12 Civ. 1028 (RJS) [rel. 11 Civ. 4509]

Dear Judge Sullivan:

As counsel for Plaintiffs, I write regarding Verizon's request for a pre-motion conference to discuss a motion for summary judgment and stay of discovery pending resolution of such a motion.

Plaintiffs intend to respond to Verizon's letter by Wednesday, January 22, in accordance with Your Honor's Individual Rules of Practice, Rule 2(A). Plaintiffs respectfully request a one-page extension to the three-page limit set by Your Honor's Rules for a response to Verizon's letter. Plaintiffs believe that three pages may not be adequate to respond fully to both Verizon's legal arguments and the impact a stay of discovery will have on the ultimate resolution of the claims against Verizon and Siemens.

Respectfully,

  
Kevin J. Fee

KORNSTEIN VEISZ WEXLER & POLLARD, LLP

The Honorable Judge Richard J. Sullivan

January 17, 2014

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cc: Gavin J. Rooney, Esq.  
Ryan J. Cooper, Esq.  
Attorneys for the Verizon Defendants

Dennis H. Tracey, III, Esq.  
Sarah J. Gregory, Esq.  
David Michaeli, Esq.  
Attorneys for Defendant Siemens Enterprise Communications, Inc.

Glenn M. Cunningham, Esq.  
Lee Anne Duval, Esq.  
Attorneys for Third-Party Defendant Tangoe, Inc.

*(Served via e-mail)*

IT IS HEREBY ORDERED THAT Plaintiffs' request is DENIED. Plaintiffs shall respond by Wednesday, January 22, 2014, with a letter not to exceed three pages.

SO ORDERED  
Date:

1/17/14

RICHARD J. SULLIVAN  
U.S.D.J.